

EXHIBIT 2

Denise Lunsford

From: Winn, Sara (USAVAW) <Sara.Winn@usdoj.gov>
Sent: Wednesday, June 17, 2020 1:26 PM
To: Denise Lunsford ; 'Platania, Joseph'; 'John Hill'
Cc: Bubar, Daniel (USAVAW); Kavanaugh, Christopher (USAVAW); Snead, Jacqueline Coleman (CIV)
Subject: RE: June 12, 2020 Order to produce documents

Hello Denise. We definitely want to help ensure no government documents are disclosed improperly. I would assume everything you received from our office would have a Bates Stamp on it but I could be mistaken. Could you send me a sample?

Sara Bugbee Winn

From: Denise Lunsford <d@lunsford-law.com>
Sent: Wednesday, June 17, 2020 12:34 PM
To: Winn, Sara (USAVAW) <SWinn@usa.doj.gov>; 'Platania, Joseph' <platania@charlottesville.org>; 'John Hill' <john@poindexterhill.com>
Subject: June 12, 2020 Order to produce documents

Sara

We communicated Monday regarding Judge Hoppe's June 12, 2020 Order requiring production of materials by my and John Hill in a civil matter pending against James Fields and others. On that day I asked if you would be willing to review materials provided by the Commonwealth to determine what, if any, of that material came from the AUSA and may be exempt from production.

Please advise if you are willing to do this review so that John and I know how to respond to the subpoenas.
thanks

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